

November 28, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: VoIP E911 Compliance Report (November 28, 2005)
i2 Telecom International, Inc.; WC Docket No. 05-196**

Dear Ms. Dortch:

i2 Telecom International, Inc. ("i2"), through its undersigned counsel and pursuant to Commission Rule 9.5(f), as adopted by the Commission's *Order*¹ concerning the enhanced 911 ("E911") service requirements and conditions applicable to interconnected Voice over Internet Protocol ("VoIP") service providers, submits this Compliance Report ("Report") to advise the Commission of the status of i2's efforts to comply with the Commission's VoIP E911 Rules.²

i2, headquartered in Atlanta, Georgia, provides international and domestic long distance calling services to subscribers using VoIP technology. With operations based in Atlanta, Georgia; Redwood City, California; i2's proprietary network uses the Internet to deliver high-quality phone calls for a fraction of the cost of traditional telecommunications service providers. Specifically, i2's VoiceStick and InternetTalker access devices enable any telephone or business phone system (PBX) to access i2's global network and advanced routing technologies to complete calls over the Internet.

i2's VoIP service is portable; if an i2 customer has access to broadband Internet access, the customer can use the service anywhere in the United States or the world. Customers may obtain their broadband Internet access from i2, but they are not required to do so. i2's VoIP

¹ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd. 10245 (2005) ("*Order*").

² Pursuant to the Commission's prior Public Notices, i2 has filed three status reports concerning its efforts to notify its customers of the limitations associated with its VoIP 911 service, and to obtain affirmative acknowledgments from those subscribers stating that they fully understand those limitations. These reports were filed in the above-referenced docket on August 10, September 1, and September 22, 2005.

November 28, 2005

Page 2

service also allows customers located in one geographic area to use telephone numbers that are associated with another area. i2's interconnected VoIP service is different than most other providers in that i2's service is used by approximately 99% of its customers as a software application. i2's customers either download the software from the Internet or purchase "memory sticks" – a portable storage device that connects to the Universal Service Bus ("USB") port on personal computers – that contains i2's "softclient." Accordingly, i2's service is much more portable than VoIP services tied to hardware devices.

As required by the Commission's rules, and consistent with the Public Notice issued by the Enforcement Bureau on November 7, 2005³ (the "Public Notice"), this Report details i2's efforts to provide E911 service to customers in compliance with Commission Rules 9.5(b) and (c), and to comply with registered location requirements of Commission Rule 9.5(d). As requested by the Enforcement Bureau in the Public Notice, the Company states as follows:

1) A quantification, on a percentage basis, of the number of subscribers to whom the Company is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.

i2 does not have E911 service available as of the date of this filing. i2 expects to make a VoIP E911 solution available to its customers in mid-December 2005. i2 cannot accurately calculate how many customers will be covered by this solution, which uses services provided to i2 by Intrado, Inc. ("Intrado"), due to the fact that i2's VoIP service is entirely software based for virtually all of its customers. Thus, the percentage of customers covered by the Intrado solution will constantly change based on the locations where i2 customers log on to use the service. However, i2 is building a system that will allow customers to use Intrado's VoIP E911 solution when they provide a registered location that is within the Intrado VoIP E911 footprint. i2 will also require customers to provide location information in order to use of the service every time their Internet protocol address changes.

For customers that do not have access to a 911 service that complies with the *VoIP E911 Order*, i2, through Intrado, plans to offer an interim 911 service. i2's contract with Intrado calls for 10-digit routing of all 911 calls to the appropriate PSAP until such time as a VoIP E911 solution is deployed to i2's customer's base. i2 is working to have both the VoIP E911 service and the Intrado 10-digit routing solution in place as soon as possible.

2) A detailed statement as to whether the Company is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the

³ *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

November 28, 2005

Page 3

PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized.”

As detailed in response to question 1, by mid-December 2005, i2 expects to transmit 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the selective router, the trunk lines between the selective router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where selective routers are utilized for customers that register a location within Intrado's VoIP E911 service footprint. i2 will continue to work with Intrado to expand its E911 service to include areas where Intrado offer such functionality. Please find attached as Exhibit A a map that illustrates both current and future areas where Intrado will offer VoIP E911 services.

3) If the Company is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, a detailed explanation of why not.

In an effort to comply with the VoIP E911 Order's 120-day requirements, i2 contacted several vendors that offered solutions that would comply with the Commission's VoIP E911 rules. Specifically, i2 considered solutions offered by TCS, Intrado, and Level 3. However, each of the solutions offered by these third-parties had limitations. For example, two providers were offering solutions that worked only within their service footprints, which did not fully overlap with i2's service area, and did not work with non-local telephone numbers. Another provider did not offer call routing services for 911 calls, but only provided database updates and verification services.

After extensive discussions with these providers concerning their E911 solutions, i2 contracted with Intrado in September 2005, to provide an E911 solution by the November 28, 2005 deadline. To use the Intrado solution, i2 was required to purchase dedicated data circuits from Intrado to connect its network to Intrado's facilities. While i2 now has the necessary circuits in place with Intrado to implement the Intrado solution, the circuits were delayed until November 22, 2005, due to various ordering problems that typically arise when installing private line circuits and due to the demands placed on Intrado by numerous parties seeking to take advantage of their service. Under normal circumstances these delays would have been inconsequential, but due to the tight timeframe established by the VoIP E911 Order, every delay became extremely problematic. Currently, i2 is testing the circuits and software applications, which typically is a three to six month process requiring thousands of hours to complete but which Intrado and i2 are work-ing to complete in less than 30 days. As a result, i2 expects to implement the Intrado VoIP E911 solution by mid-December 2005.

4) The number of Selective Routers to which the Company has interconnected, directly or indirectly, as of November 28, 2005.

As explained in response to question 2, i2 relies on Intrado to provide its VoIP E911 solution. i2 does not interconnect directly with any selective routers, instead Intrado provides i2

November 28, 2005

Page 4

with a complete E911 solution. As of November 28, 2005, Intrado has reported to i2 that Intrado is interconnected to 154 Selective Routers, either directly or indirectly.

- 5) **A detailed statement as to whether the Company is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information.**

Based on information received from Intrado, i2 believes that Intrado will transmit via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information within the service areas of the 154 Selective Routers referenced above, once Intrado's solution is implemented in mid-December. In all other areas, this information is not being transmitted at present.

- 6) **The percentage of how many answering points within the Company's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits.**

i2 does not have access to the information necessary to respond to this question. i2's service area is potentially the entire world as the service is available from any location where a customer can obtain broadband Internet access. Pursuant to correspondence with Intrado, i2 understands that 93% of the U.S. population is currently served by PSAPs utilizing E911 Selective Routers. Please find attached as Exhibit B a map provided by Intrado that illustrates the PSAPs within the United States that are not served by a Selective Router. However, i2 is unable to determine how many answering points served by Selective Routers are capable of receiving and processing ANI and Registered Location information.

Intrado is currently aware of four States and a Commonwealth that have native Selective Routing functionality but will only provide ANI-only service (not Registered Location information) to the PSAP. In New Jersey, Intrado has gained permission to deploy a voice-only service that enables the call taker to receive ANI on the VoIP 911 caller, but the state ALI system is not capable of full dynamic ALI updates and will require an upgrade. Ohio and Hawaii have not granted permission to Intrado to deploy a voice-only solution, and these states' ALI systems are not capable of full dynamic ALI updates. Further, Puerto Rico has not granted permission to Intrado to deploy a voice only solution, and the ALI systems are not capable of full dynamic ALI update.

- 7) **The percentage of subscribers whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information**

i2 lacks information regarding the percentage of PSAPs able to receive and process ANI and Registered Location information. However, through i2's discussions with Intrado, it is i2's belief that the Company will be transmitting ANI and Registered Location information by mid-

November 28, 2005

Page 5

December 2005, through its third party vendor, to entities able to utilize this information for customers that register a location within Intrado's VoIP E911 service footprint.

- 8) **If the Company is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.**

Please refer to i2's responses to questions 5 and 6 above.

- 9) **To the extent the Company has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the Company should describe in detail, either in narrative form or by map, the areas of the country, on an MSA basis, where it is in full compliance and those in which it is not.**

i2's third-party vendor, Intrado, is working on nationwide native VoIP E911 delivery in accordance with the *VoIP E911 Order*. The initial PSAP deployments are targeted in major metropolitan areas throughout the U.S. based on Intrado's customer subscriber base priorities. Exhibit A, "Major Market Deployment Map," which corresponds with MSAs, identifies regions that have connectivity to at least one Selective Router, ALI steering capabilities, ANI and the ability to populate ALI. According to the map provided by Intrado, there will be a phased deployment with some areas E911 capable by November 28, 2005, others by March 31, 2006 and additional areas by June 30, 2006. However, this estimate is predicated on Intrado's estimate that full E911 coverage will be in place by June 2006 for at least one Selective Router per county (where Selective Routers are utilized). Intrado has not advised i2 which counties have more than one Selective Router, so it is impossible for i2 to determine whether full coverage will be reached by June 2006, or whether certain customers may still be without E911 service in counties with two or more Selective Routers where Intrado has not interconnected with all available Selective Routers in those areas.

- 10) **If not in full compliance, the Company's plans for coming into full compliance with the requirements of the *Order*, including its anticipated timeframe for such compliance.**

As noted above, i2's plan for compliance necessarily relies on the ability of Intrado to meet its deployment targets. Intrado's projected timeframes for full compliance include factors outside of Intrado's control. Specifically Intrado's timeframes may or may not be met based on the level of cooperation of PSAPs, RBOCs and state and local agencies involved in the deployment of E911 services. Further, access to pseudo-ANI, testing and deploying solutions reliant on pseudo-ANI depend on the activities by this Commission and the entities appointed to be responsible for assigning these resources. Intrado cannot predict with certainty as to when it will have a fully compliant E911 solution in place for all of i2's customers but based on the information currently available to i2 from Intrado and included in this filing as Exhibit A, much of the

November 28, 2005

Page 6

country will have a VoIP E911 solution in place subject to the limitations identified in response to question 9.

- 11) A detailed description of all actions the Company has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location (including, but not limited to, relevant dates and methods of contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the Company has obtained the Registered Location).**

i2 has taken several steps to obtain Registered Location information from its Customers. i2 has completed upgrades to its website and software that allows customers to provide and update their Registered Location information with the Company. This system is also used for billing, notification and affirmative acknowledgement procedures, and other account status information. Further, the Company has implemented a signup procedure that captures customer location information that is used as Registered Location information by the Company and its vendors.. i2 will also implement a system that requires customers to provide location information every time their Internet protocol address changes in order to make use of the service. This will result in i2 obtaining 100% registered location information from all of its customers.

As part of the Intrado solution, i2 will have access to the Intrado validation and update interface ("VUI") that enables near real-time delivery of the i2 new user address information or user submitted address update information. i2 will be integrating the VUI into its existing provisioning systems to ensure seamless delivery of acquired registration location information to the Intrado system.

- 12) A detailed description of the method(s) the Company has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the Company is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.**

As noted above, the Company will activate an update process to its website that will provide customers with an online account manager feature that allows users to update their Registered Location information from any location where they have access to an Internet connection. Further, the Company has provided customers with a toll-free number whereby customers can speak with a customer care representative to update this information with the Company.

The E911 solution from Intrado provides i2 interconnected VoIP customers with a real-time provisioning interface to provision and register subscriber location data to Intrado to ensure the proper address and call back number is delivered to the appropriate PSAP at the time of an E911 call. This interface is named the Validation and Update Interface (VUI). Intrado's real-time provisioning process enabled by VUI includes a geocoding process as well as management of Master Street Address Guide (MSAG) validation at the time of provisioning. i2's customers can utilize its web portal or its service center by phone to enable the near real-time update to Intrado.

November 28, 2005

Page 7

At the time of the E911 call, Intrado uses i2's provisioned information to associate the customer provided Registered Location assigned during provisioning with the wireline PSAP boundaries maintained by Intrado to determine appropriate PSAP for delivery of the MSAG Valid address and call back number of the caller.

13) A detailed description of any technical solutions the Company is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.

i2's capability to provide nomadic VoIP E911 service is limited to Intrado's service footprint. i2 is unaware of any third party provider that is offering a solution that will cover the entire continental United States, let alone Alaska, Hawaii, the territories and possessions. As noted above, i2 subscribers have the ability to update their Registered Location information with the Company. If they provide new a Registered Location within i2's VoIP E911 footprint, they will have access to E911 functionality in compliance with the *Order*. All of i2's available resources are being utilized in establishing a VoIP E911 solution and an interim 911 solution for its interconnected VoIP service customers. The Company will explore a variety of alternatives once it has completed the initial deployment of the VoIP E911 and interim solutions for existing customers that register an address that is outside of the Company's VoIP E911 footprint.

In general, i2's third party vendor is able to route VoIP emergency calls from its VoIP network to the Intrado Network or alternative third party network for delivery to the appropriate Selective Router (so long as Intrado has connectivity to such Selective Router) and then on to the geographically appropriate PSAP via the native 9-1-1 infrastructure. The E911 services provide a "native" 9-1-1 solution for routing VoIP 9-1-1 calls from both in-region and out-of-region telephone numbers to the geographically appropriate PSAP. Intrado enables full support of nomadic usage of VoIP provided the user updates their address information upon arrival into a new location. Through Intrado's address validation and update interface the E911 solution will permit near real-time provisioning (geocoding and MSAG Validation) of the newly provisioned address and make available (assuming no errors) that user's information for delivery to the PSAP within approximately 15 minutes of receipt.

Intrado recognizes the need for removing the user interaction and self-provisioning component of the solution. To that end, Intrado is actively working and trialing a number of location determination technologies, which will be supported by Intrado and the Intrado provisioning interface.

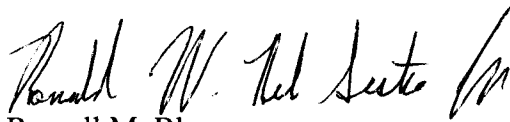
14) A description of any automatic detection mechanism that enables the Company to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensure that the customer continues to receive 911 service even when using the interconnected VoIP service nomadically.

November 28, 2005

Page 8

i2 notes that the *Order* specifically states that there is no requirement that VoIP providers provide an automatic location detection capabilities that allow VoIP providers to identify when a subscriber moves to a new location.⁴ Thus, although the *Public Notice* refers to plans submitted by AT&T, MCI, and Verizon claiming that those companies are developing such automatic detection systems, i2 has no plans at this time to independently develop such a capability. i2 is, however, reviewing the AT&T licensing agreement and considering other solutions that would provide the Company information concerning customer location. However, i2 is not convinced that AT&T's proposal is either practical for i2's service or represents an adequate interim solution. Although i2 has significant concerns regarding the AT&T Heartbeat proposal, the Company is reviewing these and other technologies and will actively work towards implementing a solution that the Company and the industry determine is in the best interest of public safety.

Respectfully submitted,



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Russell M. Blau

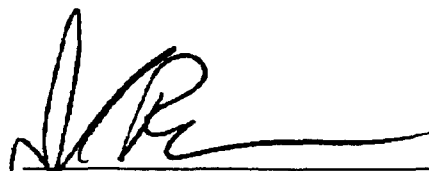
Ronald W. Del Sesto, Jr.

Counsel for i2 Telecom International, Inc.

cc: Byron McCoy (FCC)
Kathy Berthot (FCC)
Janice Myles (FCC)
Best Copy and Printing, Inc.

⁴ See *Order*, ¶ 46 & n.146.

I, James Rose, state that I am Chief Technology Officer, of i2 Telecom International, Inc.; that I am authorized to submit the forgoing *VoIP E911 Compliance Report* ("*Report*") on behalf of i2 Telecom International, Inc.; that the *Report* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Report* is true and correct to the best of my knowledge, information, and belief.

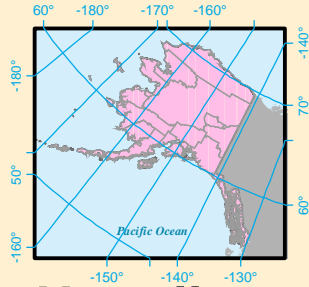


Name: James R. Rose
Title: Chief Technology Officer
i2 Telecom International, Inc.

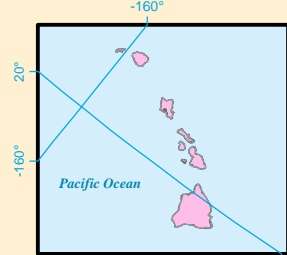
Exhibit A

Intrado Major Market VoIP E911 Rollout Map

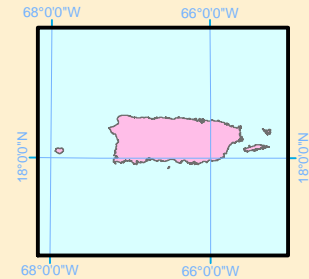
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Hawaii

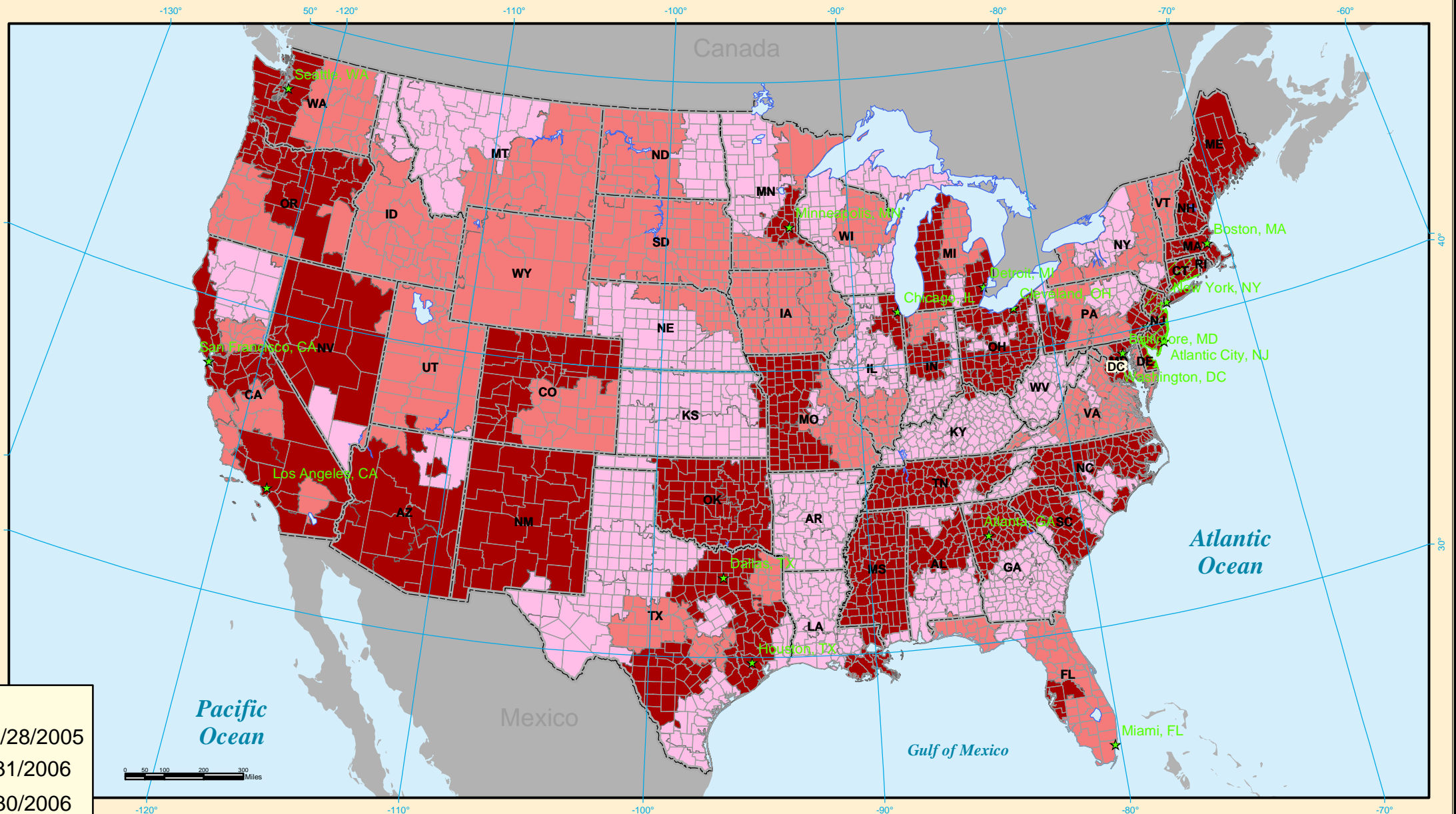


Puerto Rico



Legend

- Planned for 11/28/2005
- Planned for 3/31/2006
- Planned for 6/30/2006
- County Boundary
- ★ or
 Top 20 MSAs
- Lakes



Intrado Major Market Rollout Schedule

Albers Projection
Central Meridian: -96
1st Std Parallel: 20
2nd Std Parallel: 40
Latitude of Origin: 40

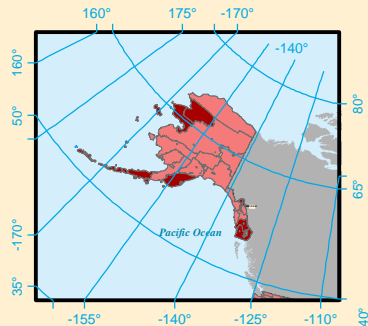
Intrado™
Informed Response.™

Intrado
WOS GIS Operations Team
Date: November 2005
Data Source: Meridian, Geode, IPS, ESRI Data
Created in ArcGIS 8 using ArcMap

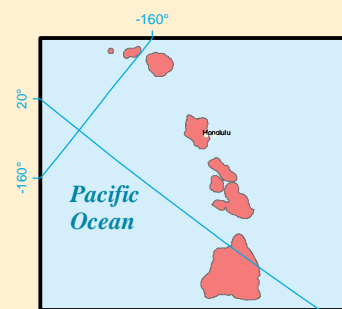
Exhibit B

Intrado Basic PSAP Map

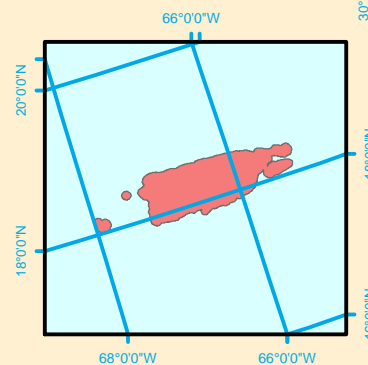
Alaska



Hawaii

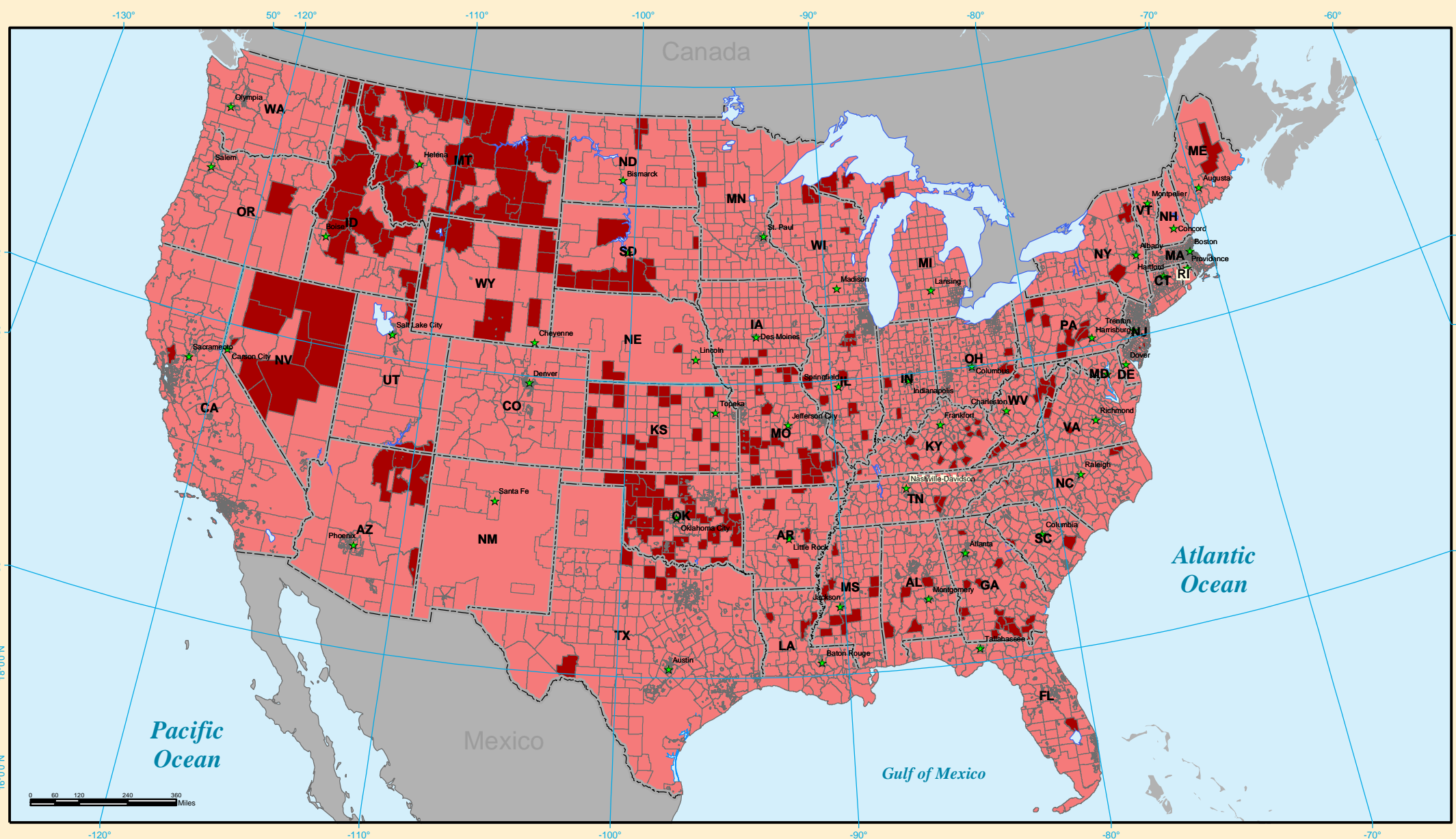


Puerto Rico



Legend

- Basic PSAPs
- Other PSAPs
- Capital Cities
- Lakes



Basic PSAPs

Albers Projection

Central Meridian: -96
1st Std Parallel: 20
2nd Std Parallel: 60
Latitude of Origin: 40

Intrado

Intrado
WOS GIS Operations
November 2005
Data Source: Geode, Meridian, ESRI Data
Created in ArcGIS 8 using ArcMap